

CUPA: Santa Clara County Environmental Health

Date of Evaluation: September 27-28, 2005

State Evaluation Team:

Cal/EPA Team Leader: Dennis Karidis

DTSC Evaluator: Mark Pear

OES Evaluator: Brian Abeel

Please complete status report

Deficiencies and Corrective Actions Status Report

1. **Deficiency:** The CUPA is not inspecting all Hazardous Waste Generators in their Jurisdiction in accordance with their stated inspection frequency (Every 3 years).

CUPA Corrective Action: It's our internal goal to maintain stated frequency of once every three years as an important factor to have a strong presence within our regulated hazardous waste generator businesses. Our past inspection frequency was risk based with the large generators being our main focus. Now that they are in pretty good compliance their frequency may be reduced and more inspections of our smaller generators will be done. We are currently going over the re-evaluation of our priorities.

Through the training that we offer to the regulated community with classes held a few times a year, we reach 100+ owners/operator and those numbers are not reflected in inspection frequency. Our staff has also offered training in the past CUPA Conferences, with special industries (dry cleaners) and to other regulators and we believe that these efforts and others not mentioned should also add in our reflection of the Hazardous Waste Generator inspection program.

We have not met our goal this past fiscal year. The inspection frequency is at 88% with 1127 inspections conducted of 3801 facilities. Our Department continues to have staffing problems. Two inspector positions continue to be vacant. One of the position is due to medical disability and the other position is vacant due to budget constraint. Our continued focus will be to reach fully staff status and review our inspection prioritization process. We will continue to strive for meeting our goals.